

BRIAN L. JOHNSRUD, State Bar No. 184474
MORGAN, LEWIS & BOCKIUS LLP
2 Palo Alto Square
3000 El Camino Real, Suite 700
Palo Alto, CA 94306-2212
Tel: 650.843.4000
Fax: 650.843.4001
E-mail: *bjohnsrud@morganlewis.com*

M. MICHAEL COLE, State Bar No. 235538
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco CA 94105-1126
Tel: 415.442.1000
Fax: 415.442.1001
E-mail: *mcole@morganlewis.com*

Attorneys for Defendants
DEUTSCHE ASSET MANAGEMENT,
DEUTSCHE BANK AG, DEUTSCHE
INVESTMENT MANAGEMENT AMERICAS, INC.
SCUDDER DISTRIBUTORS, INC.

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

LAWRENCE ROMANECK,
Plaintiff,

v.

DEUTSCHE ASSET MANAGEMENT, a
Delaware corporation, DEUTSCHE BANK
AG, a New York corporation, DEUTSCHE
INVESTMENT MANAGEMENT
AMERICAS, INC., a corporation, SCUDDER
DISTRIBUTORS, INC. a corporation,
INDIVIDUAL DOES I-XV and CORPORATE
DOES XVI – XXV, inclusive

Defendants.

Case No. C 05 02473 TEH

~~XXXXXXXXXX~~
**PROPOSED STIPULATION AND
ORDER ON PLAINTIFF'S
DISCOVERY**

IT IS HEREBY STIPULATED AS FOLLOWS:

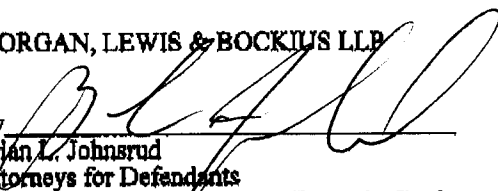
(a) Plaintiff shall conclude the depositions of current and former employees of Defendant presently on calendar and agreed to be scheduled;

(b) Following the conclusion of these depositions, Plaintiff will have up to June 5, 2006, to identify up to 50 of the 245 Requests for Admissions in his First Set of Requests for Admission for Defendant to respond to by July 6, 2006. Plaintiff's Special Interrogatory asking Defendant to set forth the facts and documents supporting the denial of a requested admission may accompany up to 25 of these Requests for Admission, but only to the extent it does not call for cumulative and duplicative discovery. Nothing herein shall preclude Plaintiff from seeking leave of Court to propound Requests for Admission and Special Interrogatories beyond those identified herein.

(c) Plaintiff shall have until July 18, 2006, to file any motion to compel regarding these Requests for Admission and Special Interrogatory.

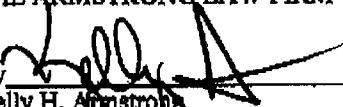
Dated: May 10, 2006

MORGAN, LEWIS & BOCKIUS LLP

By 
 Brian L. Johnsrud
 Attorneys for Defendants
 Deutsche Asset Management, Deutsche Bank
 AG, Deutsche Investment Management
 Americas, Inc., Scudder Distributors, Inc.


Dated: May 10, 2006

THE ARMSTRONG LAW FIRM

By 
 Kelly H. Armstrong
 Attorney for Plaintiff
 Lawrence Romanek

Dated: May 10, 2006

THE BRADY LAW GROUP

By 
 Steven J. Brady
 Attorney for Plaintiff
 Lawrence Romanek

ORDER

The Court, having considered the Stipulation of Plaintiff and Defendant, approves said Stipulation per the terms contained therein.

IT IS SO ORDERED.

Dated: May 23 2006

